

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Karen M. Wyand, individually and as
Executor of the Estate of Terry L. Wyand,

Plaintiff,

v.

Airbnb, Inc., Vacasa South Carolina LLC,
Judith C. Powell, and Elizabeth Baugh,

Defendants.

Civil Action No.: 2:24-cv-07226-DCN

**DEFENDANT AIRBNB, INC.'S
RESPONSES TO
LOCAL RULE 26.01
INTERROGATORIES**

Defendant Airbnb, Inc., (hereinafter "Airbnb"), by and through undersigned counsel, hereby responds to Local Civil Rule 26.01 Interrogatories pursuant to the Local Rules of the United States District Court for the District of South Carolina.

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has requested a jury trial in the Complaint and as a result, to the extent the case is not disposed of as a matter of law prior to trial, a jury trial is appropriate for this dispute.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Airbnb, Inc. is a publicly owned company. Airbnb, Inc. is not a parent, subsidiary, partner, or affiliate of another publicly owned company. Airbnb, Inc. has no parent corporation and no publicly held corporation owns more than 10% of Airbnb, Inc.'s stock. Airbnb, Inc. does not own 10% or more of the outstanding shares of any publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This removal action was filed in the Charleston Division on the basis that a substantial part of the events or omissions giving rise to this action occurred in Charleston County, which is nearest to the Charleston Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: This action is not related to any other actions.

(F) [Defendants only]. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Airbnb, Inc. does not contend it was improperly identified in Plaintiff's Complaint.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Plaintiff has also named Vacasa South Carolina LLC, Judith C. Powell, and Elizabeth Baugh as Defendants in this matter. Airbnb, Inc. is unaware at this time of any other person or legal entity that is in whole or in part liable to it or Plaintiff, relative to the allegations in Plaintiff's Complaint.

(H) Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER: Airbnb, Inc. is a citizen of Delaware (its place of incorporation) and California (its principal place of business).

s/Robert C. Blain

Robert C. Blain, Federal ID No. 11470

Taylor A. Gardner, Federal ID No. 14224

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